

Morton & Craig LLC
John R. Morton, Jr., Esq.
110 Marter Ave.
Suite 301
Moorestown, NJ 08057
Telephone: 856-866-0100
Attorney for: Santander Consumer USA Inc.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)	Case No. 19-14635(MBK)
)	
CHRISTOPHER REGINALD CONYER)	Chapter 13
)	
)	Hearing date: 5-14-19
)	
)	<u>OBJECTION TO CONFIRMATION</u>
)	

Santander Consumer USA Inc. ("Santander") a secured creditor of the debtor, objects to the debtor's plan for the following reasons:

a. PLAN SILENT AND DOES NOT PROVIDE FOR PAYMENT OF PRE-

PETITION ARREARS: Santander holds a first purchase money security interest encumbering 2013 SUBARU CROSSTREK owned by the debtor. The plan is silent as to Santander. Santander filed a proof of claim with pre-petition arrears of \$399.79. The term of debtor's loan with Santander exceeds the length of the plan. The plan should be amended. Part 4b of the plan should state that the debtor will pay \$399.79 of arrears through the plan with current payments of \$348.86 to be paid directly to Santander. The plan should also state that Santander will

retain its lien on the vehicle after confirmation, and if the plan completes and the debtor receives a discharge before the retail installment contract with Santander is paid in full according to its terms, the debtor's obligations under the retail installment contract will not be discharged.

- b. **Proof of insurance:** Santander requests that the debtor provide it with proof that the vehicle is insured as required by 11 U.S.C. 1326(a)(4).

/s/ John R. Morton, Jr.
John R. Morton, Jr., attorney for
Santander Consumer USA Inc.

Dated: 4-29-19